

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Case No. 25-mc-20 (___/___)

Plaintiff,

v.

**STIPULATION TO EXTEND
TIME TO COMMENCE
JUDICIAL FORFEITURE
PROCEEDINGS**

1. 70.57 Beacon ETH (BETH) seized from account with User ID XXXXX4852 held in an unknown name at Binance, George Town, Grand Cayman,
2. 10,696,448.26 Terra Classic (LUNC) seized from account with User ID XXXXX4852 held in an unknown name at Binance, George Town, Grand Cayman,
3. 194,138.47 XRP seized from account with User ID XXXXX4852 held in an unknown name at Binance, George Town, Grand Cayman,

Defendants,

and

Cui Yingtao,

Claimant.

The Plaintiff and the Claimant stipulate, pursuant to 18 U.S.C. § 983(a)(3)(A), to extend the time in which the Plaintiff is required to file a Complaint for Forfeiture or to obtain an Indictment alleging forfeiture until June 24, 2025.

1. On or about October 25, 2024, the Federal Bureau of Investigations (FBI) seized the following assets:

- a. 70.57 Beacon ETH (BETH) seized from account with User ID XXXXX4852 held in an unknown name at Binance, George Town, Grand Cayman;
- b. 10,696,448.26 Terra Classic (LUNC) seized from account with User ID XXXXX4852 held in an unknown name at Binance, George Town, Grand Cayman; and
- c. 194,138.47 XRP seized from account with User ID XXXXX4852 held in an unknown name at Binance, George Town, Grand Cayman (together, “the Defendant Assets).

2. The FBI commenced administrative forfeiture proceedings for the Defendant Assets and sent written notice to all known interested parties of its intent to forfeit the Defendant Assets.

3. Cui Yingtao filed a timely claim for the Defendant Assets through his attorneys, Paul Engh and Christopher Adams.

4. The time has expired for any other person to file a claim for the Defendant Assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no other claims for any portion of the currency have been received from any other individual or entity.

5. Under 18 U.S.C. § 983(a)(3)(A), the government has 90 days after a claim has been filed in an administrative action to bring a civil complaint for forfeiture, “except that a court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties.”

6. The parties agree to extend the deadline under 18 U.S.C. § 983(a)(3) for filing a judicial forfeiture proceeding with respect to the Defendant Assets until June 24, 2025 in order to allow time for settlement discussions.

Dated: April 23, 2025

LISA D. KIRKPATRICK
Acting United States Attorney

s/ Craig R. Baune
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Date: April 23, 2025

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Cui Yingtao